

1 **POLSINELLI LLP**

2 Randy B. Soref (SBN 99146)
3 2049 Century Park East, Suite 2900
4 Los Angeles, CA 90067

5 Telephone: 310.556.1801

6 Facsimile: 310.556.1802

7 Email: rsoref@polsinelli.com

8 *Attorneys for Whitebox Multi-Strategy Partners, LP*
9 *And Whitebox Asymmetric Partners, LP*

10 **UNITED STATES BANKRUPTCY COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA**

12 **SAN FRANCISCO DIVISION**

13 In re

Case No. 19-30088 (DM)

14 PG&E CORPORATION

Chapter 11

15 and

(Jointly Administered) (Lead Case)

16 PACIFIC GAS AND ELECTRIC
17 COMPANY,

**NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL NOTICE**

18 Debtors.

- 19 ☐ Affects PG&E Corporation
20 ☐ Affects Pacific Gas and Electric
21 Company
22 ☒ Affects **both Debtors**

*All papers shall be filed in the Lead Case
No. 19-30088 (DM)

23 **PLEASE TAKE NOTICE** that the undersigned, hereby files their appearances as attorneys
24 for Whitebox Multi-Strategy Partners, LP and Whitebox Asymmetric Partners, LP (collectively
25 “Whitebox”), by and through their legal counsel, Polsinelli, LLP, hereby enters this appearance
26 pursuant to section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”), and
27 Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and request
28 that the counsel listed below be added to the official mailing matrix, CM/ECF, and service lists in
the above entitled Bankruptcy Cases. Whitebox further requests, pursuant to Bankruptcy Rules

1 2002, 3017 and 9007 and section 1109(b) of the Bankruptcy Code, that copies of all notices and
2 pleadings given or required to be given in the Bankruptcy Cases and copies of all papers served or
3 required to be served in the Bankruptcy Cases, including but not limited to, all notices (including
4 those required by Bankruptcy Rule 2002), reports, pleadings, motions, applications, lists,
5 schedules, statements, and all other matters arising herein or in any way related to the Bankruptcy
6 Cases, including in adversary proceedings, be given and served upon Polsinelli, LLP, at the
7 following address:

8 Randy B. Soref
9 Polsinelli LLP
10 2049 Century Park East, Suite 2900
11 Los Angeles, CA 90067
Telephone: 310.556.1801
Facsimile: 310.556.1802
Email: rsoref@polsinelli.com

12 **PLEASE TAKE FURTHER NOTICE** that, pursuant to section 1109(b) of the Bankruptcy
13 Code, the foregoing request applies to and includes not only the notices and papers referenced in the
14 Bankruptcy Rules and Bankruptcy Code, but also includes, without limitation, all orders, notices and
15 pleadings relating to any application, motion, petition, objection, pleading, request, complaint or
16 demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed
17 by mail, telephone, courier services, hand delivery, facsimile transmission, electronic mail, telex or
18 otherwise that (i) affects, or seeks to affect, or may potentially affect in any way, any rights or
19 interests of any creditor or party-in-interest in these Cases; (ii) affects, or seeks to affect (a) the
20 above-captioned Debtors and/or their estates or (b) property or proceeds thereof in the possession,
21 custody, or control of others that any of the Debtors or their estates may seek to use; or (iii) requires
22 or seeks to require any act, delivery of any property, payment or other conduct by Unsecured
23 Creditor.

24 **PLEASE TAKE FURTHER NOTICE** that neither the request for notice, nor any
25 subsequent appearance, pleading, claim, proof of claim, document, suit, motion, or any other writing
26 or conduct shall constitute a waiver by Unsecured Creditor of any:

27 a. Right to have any final orders in any non-core matters entered only after de novo
28 review by a United States District Court Judge;

1 b. Right to trial by jury in any proceeding in which this right exists, whether the
2 right to be designated legal or private; whether the right is asserted in any related case,
3 controversy or proceeding, notwithstanding the designation *vel non* of the proceeding as “core”
4 under section 157(b)(2)(H) of the United States Bankruptcy Code, and whether the right is
5 asserted under statute or the United States Constitution;

6 c. Right to have the United States District Court withdraw the reference of this
7 matter in any proceeding subject to mandatory or discretionary withdrawal; or

8 d. Other rights, claims, actions, defenses, set-offs, recoupments of other matters to
9 which this party in interest is entitled under any agreements, at law or in equity, or under the
10 United States Constitution;

11 e. Unsecured Creditor expressly reserves all rights listed above. Filing this request
12 for notice or participating in this bankruptcy case should not be deemed to constitute a
13 concession or admission of jurisdiction in this case or before this Court.

14 Dated: May 30, 2019

Respectfully submitted,
POLSINELLI PC

16 By: /s/ Randye B. Soref
Randye B. Soref

17 Counsel for Whitebox Multi-Strategy Partners,
18 LP and Whitebox Asymmetric Partners, LP